



JEFFREY M. NELSON
Chief Legal Officer

Office of Regulatory Staff
1401 Main Street
Suite 900
Columbia, SC 29201
(803) 737-0800
ORS.SC.GOV

March 10, 2020

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Petition of Georgia Power Company for Declaratory Order Finding That a Certificate of Environmental Compatibility and Public Convenience and Necessity is not Required or, in the Alternative, Application for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of Georgia Power's South Carolina Portion of the Graniteville – South Augusta 230kV Tie Line and Associated Facilities
Docket No. 2020-67-E

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff (“ORS”) hereby notifies the Public Service Commission of South Carolina (“Commission”) that ORS has reviewed the filing submitted by Georgia Power Company (“Georgia Power” or “Company”) to replace its existing Portion of the Graniteville – South Augusta 230 kilovolt (kV) Tie Line and Associated Facilities (“Tie Line”) with “like facilities” or alternatively apply an Application for a Certificate of Environmental Compatibility and Public Convenience and Necessity (“Certificate”) for the Construction and Operation of the Tie Line.

Overview of Company's Request

Georgia Power intends to complete and energize the Tie Line by early May of 2020 for testing and to place the line into commercial operations on June 1, 2020. The Tie Line interconnects with the Dominion Energy South Carolina, Inc. (“DESC”) portion of the Graniteville – South Augusta 230 kilovolt (kV) Tie Line after crossing the Savannah River on the property of DESC's Urquhart Generating Station. The Commission issued a Certificate for the DESC portion of the Graniteville – South Augusta 230 kilovolt (kV) Tie Line in Docket No. 2017-221-E, Order No. 2017-689 on November 2, 2017.

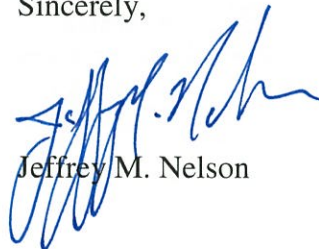
The Company specifically requests for a determination by the Commission that the replacement of the Tie Line constitutes “the replacement of an existing facility with a like facility” and therefore does not constitute “construction of a major utility facility” for which a certificate would be required under the Utility Facility Siting and Environmental Protection Act, S.C. Code Ann. §58-33-10 to 170 (Supp. 2015). The Company states in its request that the Commission should not require a Certificate due to the unique circumstances of the Tie Line as detailed in its request. However, should the Commission determine that the Tie Line does not meet the criteria for a “like facilities” finding, Georgia Power petitions the Commission for a Certificate for the Tie Line.

ORS Recommendation

After reviewing the Company’s request and conducting discussions with Company personnel, ORS understands the Company’s position regarding seeking a “like facilities” filing as described by S.C. Code Ann. § 58-33-110(1) (2015) given the unique nature of this project. Should the Commission determine that the Company’s request does not exceed the criteria for a “like facilities” filing, ORS has no objection to the Company’s filing.

Please do not hesitate to contact either me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeffrey M. Nelson', is written over the printed name.

Jeffrey M. Nelson

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)

(Continued...)